

Exhibit A

Proposed Form of Order

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,)	
)	
Plaintiff,)	
)	
v.)	Misc. No. 17-151-LPS
)	
BOLIVARIAN REPUBLIC OF)	
VENEZUELA,)	
)	
Defendant.)	

**[PROPOSED] ORDER REGARDING SCHEDULE
FOR THE REMAINDER OF THE MARKETING PROCESS**

Having adopted the Special Master’s recommendation for and designated Red Tree Investments, LLC as the Stalking Horse (D.I. 1741 ¶ 1), and having reviewed the Special Master’s proposal, after meeting and conferring with the Sale Process Parties, for the Topping Period timeline, deadlines for discovery, and deadlines and page limits for objections to be filed and briefed in connection with whatever recommendation the Special Master makes at the conclusion of the Topping Period,¹

¹ All capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the *Sixth Revised Proposed Order (A) Establishing Sale and Bidding Procedures, (B) Approving Special Master’s Report and Recommendation Regarding Proposed Sale Procedures Order, (C) Affirming Retention of Evercore as Investment Banker by Special Master and (D) Regarding Related Matters* (D.I. 481) (the “**Sale Procedures Order**”).

IT IS HEREBY ORDERED that:

1. The following dates and deadlines shall apply for the remainder of the Marketing Process:

Event	Date	TPL +
Topping Period Launch (“ TPL ”)	April 28, 2025	TPL
Conclusion of Topping Period	May 28, 2025	TPL + 30
Deadline for Special Master to submit his Final Recommendation	June 11, 2025	TPL + 44 (14 days after conclusion of Topping Period)
Deadline for the filing of any objections to the Special Master’s Final Recommendation	June 20, 2025	TPL + 53 (9 days after Final Recommendation)
Deadline for the filing of responses to objections to the Special Master’s Final Recommendation	June 27, 2025	TPL + 60 (7 days after objection deadline)
Deadline for the filing of replies regarding any objections to the Special Master’s Final Recommendation	July 3, 2025	TPL + 66 (6 days after response deadline)
Deadline for Special Master to submit Joint Status Report	July 10, 2025	TPL + 73
Conclusion of the discovery period	July 17, 2025	TPL + 80
Commencement of the Sale Hearing	July 22, 2025	TPL + 85 (19 days after conclusion of briefing related to Final Recommendation)

2. The page limits for the briefing related to the Special Master's Final Recommendation shall be governed by D. Del. LR 7.1.3 as follows: (i) objections shall not exceed 20 pages; (ii) responses to objections shall not exceed 20 pages; and (iii) replies shall not exceed 10 pages.

3. The Special Master is hereby directed to meet and confer widely with parties-in-interest and thereafter submit to the Court by no later than **July 10, 2025** a joint status report setting out, as best can be determined, (i) which witnesses (if any) will appear at the Sale Hearing, (ii) how much courtroom time the Court should allocate for the Sale Hearing, and (iii) how that time should be divided among those who intend to participate in the Sale Hearing.

Dated: _____, 2025
Wilmington, Delaware

HONORABLE LEONARD P. STARK
UNITED STATES DISTRICT COURT